

USDC SDNY **DOCUMENT ELECTRONICALLY FILED** DOC #: 11/10/2021 DATE FILED:

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Labor and Employment Law Division

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THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007

November 9, 2021

BY ECF

Honorable Victor Marrero United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: Samaan v. The City of New York et al.

Civil Action No. 18 Civ. 9221 (VM)(DCF)

Law Dept. No.: 2018-069995

Dear Judge Marrero:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for Defendants City of New York, Robert D'Allessio, Geoffrey Eisele, Matthew Millner, and Leonid Miller (collectively "Defendants") in the above-referenced action. Defendants submit this letter in accordance with this Court's Rule 1(F) to request an extension of time for Defendants to submit a pre-motion letter prior to moving for summary judgment from November 12, 2021 to November 19, 2021. This is Defendants' third request for an extension of time and Plaintiff has consented to this request.

This adjournment is necessary as counsel for Defendants has been subject to unexpected deadlines and demands in other matters including a recent order to show cause before the New York State Supreme Court. Defendants require additional time to finalize their pre-motion letter in light of these obligations of counsel. Accordingly, Defendants respectfully request a one week extension of time to submit a pre-motion letter.

Thank you for your consideration of this request.

Respectfully Submitted,

<u>/s/</u>

Victor Marrero U.S.D.J.

Nicholas Green Assistant Corporation Counsel

cc: By ECF

Anthony C. Ofodile, Esq. *Attorney for Plaintiff* 498 Atlantic Avenue Brooklyn, New York 11217

The deadline for Defendants to file a pre-motion letter prior to moving for summary judgment, in accordance with the Court's Individual Rules, is extended to November 19, 2021.

SO ORDERED.

November 10, 2021

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